UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

IMPERIUM IP HOLDINGS (CAYMAN), LTD.,	
Plaintiff and Counterclaim Defendant,	Case No. 4:14-cv-00371 (RC)(ALM)
v.	
SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, AND SAMSUNG SEMICONDUCTOR, INC.	
Defendants and Counterclaim Plaintiffs.	

JOINT MOTION TO EXTEND THE EXPERT DISCOVERY DEADLINE

Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. and Plaintiff Imperium IP Holdings (Cayman), Ltd. (collectively, the "Parties") jointly move to extend the deadline to complete expert discovery to October 30, 2015.

Under the Court's Scheduling Order (Dkt. No. 70), the Expert Discovery Deadline is October 6, 2015.¹ In accordance with the Court's latest amendment to the Scheduling Order (Dkt. No. 122), the Parties' designated Expert Witnesses provided opening and rebuttal reports on September 9, 2015 and September 28, 2015, respectively. An extension of the Expert Discovery Deadline to October 28, 2015 will provide the Parties with additional time to complete the depositions of these witnesses. This amendment is requested in good faith and will not result in undue delay or impact the Pretrial Conference or Jury Selection dates in this matter.

¹ The Expert Discovery deadline was unchanged by the Court's previous amendments to the Scheduling Order (Dkt. Nos. 90, 122).

Therefore, the parties respectfully request that the Court grant the attached order.

Dated: October 2, 2015 Respectfully submitted,

By: /s/ Samuel Brenner

(by John F. Bufe, with permission)

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Attorneys for Defendants Samsung Electronics Co., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. Dated: October 2, 2015

Respectfully submitted, By: /s/ R. William Sigler

(by John F. Bufe, with permission)

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CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2015, the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and thereby served upon counsel of record.

By: /s/ John F. Bufe
John F. Bufe

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that the parties met and conferred as required by Local Rule CV-7(h) and that the motion is jointly submitted.

By: /s/ John F. Bufe
John F. Bufe